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Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**RESPONSE TO ORDER RE LETTER  
RE: PREPARATION FOR HIGH  
WIND SEASON AND NUMBER OF  
FIRES (GREATER OR EQUAL TO  
10 ACRES IN SIZE)**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company ("PG&E") respectfully submits this  
response to the Court's October 2, 2019 request for information regarding certain fires referenced in

PG&E's October 1, 2019, submission regarding its preparation for high wind season and the number of fires (greater or equal to 10 acres in size) in 2019 that involved PG&E equipment.

In its October 1, 2019 submission, PG&E identified nine fires of ten acres or more during 2019 that its equipment may have contributed to igniting. On October 2, the Court requested that PG&E provide the following information with respect to three of those fires (the two ignitions potentially caused by vegetation and the one ignition potentially caused by equipment failure):

1. total acreage of the fires caused;
2. location;
3. name;<sup>1</sup>
4. timing;<sup>2</sup>
5. structures burned;
6. exact cause of the fires; and
7. any other pertinent details.

PG&E provides that information below.

In preparing its October 1, 2019 submission, PG&E relied on data that it had compiled in the ordinary course of business about incidents in its service territory through September 17, 2019. In preparing this response, PG&E has identified one additional fire of ten acres or more that occurred on September 28, 2019. Although the cause is currently unknown and Cal Fire is investigating, PG&E's equipment may have contributed to igniting that fire. In an abundance of caution, PG&E is also providing the information requested in the October 2 Order with respect to this additional fire.

PG&E's analysis of the events described below is ongoing and the information below represents PG&E's current understanding of the circumstances.

<sup>1</sup> PG&E understands "name" to request the California Department of Forestry and Fire Protection ("Cal Fire") or other fire fighting agency designation for the fire, to the extent one exists.

<sup>2</sup> PG&E understands "timing" to request the date the ignition occurred and the date on which it the fire spread had been contained.

### B. May 30, 2019 Ignition

1. The fire was approximately 53 acres.
2. The fire occurred in Kern County.
3. The Kern County Fire Department designation for this fire is the Belridge Fire.
4. The fire ignited on May 30, 2019, at approximately 11:00 p.m. and was contained at approximately 8:20 a.m. the following day.
5. There were no structures burned.
6. It appears that the fire ignited because the tie wire that held the conductor to the insulator on the pole cross arm had a break in it, which allowed the conductor to fall, contacting vegetation on the ground.

7. The last overhead inspection of the conductor occurred on February 26, 2019. At that time, the inspector identified that the tie wire had a break in it, and he issued an electric corrective (“EC”) notification identifying the tie wire for repair. The inspector designated the EC notification as an “E” priority, the default priority level for a broken tie wire, which required the repair to be completed within one year, by February 2020. An inspector may escalate an EC notification to a higher priority level based on the likelihood of equipment failure and the potential impact if there is a failure. In this circumstance, the inspector concluded that the condition did not warrant escalation to a higher priority level. The individual at PG&E responsible for reviewing the inspector’s EC notification did not change the priority level assigned by the inspector. The subject equipment is not located in a High Fire Threat District (“HFTD”) area on the California Public Utilities Commission’s HFTD map.

C. **September 16, 2019 Ignition**

1. The fire was approximately 13 acres.
2. The fire occurred in Mariposa County.
3. The Cal Fire designation for this fire is the Grove Fire.
4. The fire ignited on September 16, 2019, at approximately 3:00 p.m. and was contained at approximately 8:40 p.m. the same day.
5. There were no structures burned.
6. It appears that the fire ignited when a limb from a grey pine failed and contacted the conductor, causing the conductor to contact the ground.
7. There was a routine vegetation management inspection of the area on April 18, 2019, and a CEMA patrol<sup>3</sup> on September 5, 2019, less than two weeks

<sup>3</sup> As described to the Court in prior submissions, PG&E’s Drought and Tree Mortality Response Program (also known as the Catastrophic Event Memorandum Account (“CEMA”) Program), requires that pre-inspectors conduct additional ground and aerial patrols of PG&E’s power lines in high fire-threat areas. These additional patrols provide a

prior to the incident. Neither the routine pre-inspector nor the CEMA pre-inspector identified the subject tree for trimming or removal. The tree was approximately 65 feet tall. It was rooted approximately 50 feet from the conductors, outside of the prescribed clearance zones. The tree is alive and the limb appeared to be healthy when it contacted the conductor.

D. **September 28, 2019 Ignition**

1. The fire was approximately 300 acres.
2. The fire occurred in Butte County.
3. The Cal Fire designation for this fire is the Hwy ("Highway") Fire.
4. The fire ignited on September 28, 2019, at approximately 2:00 p.m. and was contained at approximately 5:30 p.m. the same day.
5. There were no structures burned.
6. The cause of this fire is currently unknown, and it is possible that PG&E's equipment may not be involved. Cal Fire is currently investigating this fire. *See California Department of Forestry & Fire Protection, Hwy Fire, General Information available at <https://www.fire.ca.gov/incidents/2019/9/28/hwy-fire/>.*

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second, third, and sometimes fourth inspection of approximately 50 percent of PG&E's overhead distribution lines each year.

Dated: October 9, 2019

Respectfully Submitted,

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